

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS
ANTITRUST LITIGATION

MDL No. 2817
Case No. 18 C 864

This Document Relates to:

Hon. Robert M. Dow, Jr.
Magistrate Judge Jeffrey T. Gilbert

Motor Vehicle Software Corp. v. CDK Global, Inc., et al., Case No. 1:18-cv-865 (N.D. Ill.)

Authenticom, Inc. v. CDK Global, LLC, et al., Case No. 1:18-cv-00868 (N.D. Ill.)

Cox Automotive, Inc, et al. v. CDK Global, LLC, Case No. 1:18-cv-1058 (N.D. Ill.)

Loop, LLC, d/b/a AutoLoop v. CDK Global, LLC, Case No. 18-cv-2521 (N.D. Ill.)

**DECLARATION OF MICHAEL N. NEMELKA IN SUPPORT OF
INDIVIDUAL AND VENDOR CLASS PLAINTIFFS' OPPOSITION TO
CDK'S MOTION FOR A PROTECTIVE ORDER**

I, Michael N. Nemelka, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner with the law firm of Kellogg, Hansen, Todd, Figel & Frederick, P.L.L.C. in Washington, D.C., which is MDL Co-Lead Counsel and Interim Class Counsel for the Vendor Class in the above captioned case. I respectfully submit this declaration in support of Plaintiffs' Opposition to Defendant CDK Global, LLC's Motion for A Protective Order.

2. Attached as **Exhibit A** is a true and correct copy of an email between M. Nemelka and M. Provance dated November 20, 2018, regarding the Second Set of RFPs to CDK from the Individual and Vendor Class Plaintiffs.

3. Attached as **Exhibit B** is a true and correct copy of Individual and the Vendor Class Plaintiffs' Second Set of Requests for the Production of Documents to Defendant CDK (dated October 12, 2018).

4. Attached as **Exhibit C** is a true and correct copy of the document Bates-stamped AL_MDL_0025997.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: December 4, 2018

/s/ Michael N. Nemelka

Michael N. Nemelka